



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 23, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

Pursuant to the Court's Order at Dkt. No. 482, the Government seeks redactions to Exhibit 1 to the defendant's response to the Government's motion to preclude the testimony of Dr. Dietz and Dr. Loftus. The Government's proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the parties' supplemental briefing and the Court's Opinion & Order are judicial documents subject to the common law presumption of access, the limited proposed redactions are narrowly tailored to protect the privacy interests of the Minor Victims and third parties, including individuals who have not identified themselves on the record in this case, and who are subjects of the Court's pseudonym order.

The Government does not seek redactions to the defense response or the Court's Opinion & Order. The defense has informed the Government that it is not seeking any additional redactions.

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Respectfully submitted,

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Cc: Defense Counsel (By ECF)